

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 4 CASES LISTED IN
EXHIBIT A OF DEFENSE NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF
NEERAJ KOHLI, M.D. FOR WAVE 4**

Come now, the Plaintiffs, and hereby adopt and incorporate by reference the *Daubert* response filed against Neeraj Kohli, M.D. for Ethicon Wave 3, Dkt. No. 2944. Plaintiffs respectfully request that the Court deny Defendants' motion, for the reasons expressed in the Wave 3 response briefing.

Dated: April 26, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

By: /s/ Edward A. Wallace
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